

AB:MJB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21, U.S.C., § 841; T. 18,
U.S.C., § 2)

BOYAN WU, WEI WAN AO and
JING TAO MEI,

19-MJ-930

Defendants.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

SOTIRIOS V. MALAMIS, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration (“DEA”), duly appointed to law and acting as such.

On or about October 10, 2019, within the Eastern District of New York, the defendants BOYAN WU, WEI WAN AO, and JING TAO MEI, did knowingly and intentionally manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance, to wit, marijuana, in violation of 21 U.S.C. § 841(a)(1).

(Title 21, United States Code, Section 841; Title 18, United States Code, Section 2)

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary

1. I am a Special Agent with the DEA and have been for approximately ten years. In my capacity as a Special Agent, I have participated in investigations of narcotics and money laundering activities, including surveillance and the execution of search warrants and the monitoring of electronic tracking devices. I am familiar with the methods used to package and process controlled substances, including marijuana. I am familiar with the facts and circumstances of this investigation from my personal participation in this investigation, and from information obtained from other law enforcement agents and others. I have been involved in numerous investigations involving marijuana distribution, packaging, sales, and other criminal activities associated with marijuana.

2. On October 10, 2019, I, along with other members of law enforcement were present at a storage facility located at 2727 Knapp Street, Brooklyn, NY. The defendants BOYAN WU, WEI WAN AO, and JING TAO MEI were observed breaking open pallets that were filled with large boxes.

3. The defendants were then observed opening the boxes and removing large packages of marijuana and re-packaging the marijuana into large black plastic bags. The total amount of marijuana within the storage facility where defendants were observed is approximately 700 – 1,000 pounds.

4. The storage unit is rented by defendant WEI WAN AO. Defendants WEI WAN AO and JING TAO MEI admitted the material they were re-packaging was

to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

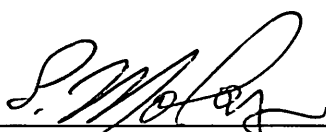
marijuana. Once law enforcement confirmed that the material was in fact marijuana, all three defendants were placed under arrest.

5. Defendant JING TAO MEI stated that all three defendants have engaged in similar criminal behavior in the past.


6. On October 10, 2019 from approximately 6:00 - 7:00 pm, a certified canine named "Balu" alerted to the presence of marijuana at the pallets, the large black plastic bags and boxes. "Balu" has been continuously certified as a narcotic detection K9 since June 6, 2018, has assisted in several investigations, and has been previously found reliable.

7. All three defendants were placed under arrest at 2727 Knapp Street, Brooklyn, NY.

WHEREFORE, your deponent respectfully requests that the defendants BOYAN WU, WEI WAN AO, and JING TAO MEI, be dealt with according to law.


SOTIRIOS V. MALAMIS
Special Agent
~~Federal Bureau of Investigation~~
Drug Enforcement Administration.

Sworn to before me this
11th day of ~~July~~ ^{October}, 2019


THE HONORABLE
UNITED STATES
EASTERN DISTRICT OF NEW YORK

S/Kuo

JE